

CONZALOS GLASCO

Plaintiff

v.

Superintendent Hanks, Major Elliott,
Captain Conyers, Captain Gilley,
Captain Stoneberger, Lieutenant Watson,
(Sgt. Kraus), Nurse Hoover
Psychiatrist Doctor Laving
Grievances Specialist Seife
Officer S. Mays, Officer Jr. Moore
Officer C. Bratton [REDACTED]

IN THE COURT
OF THE STATE OF
INDIANA
LAUREL, INDIANA

2013 FEB 22 PM 3:52

SOUTHERN DISTRICT OF
INDIANA
LAUREL, INDIANA

1:13-cv-0303 RLY-MJD

RECEIVED

FEB 22 2013

Civil Right ComplaintUnder 42. U.S.C. 1983I. Introduction

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

This Civil Right Action brought by a State Prisoner Under 42. U.S.C. 1983 for damages & declaratory judgement and injunction, I Allego that defendants displayed deliberate indifference to Plaintiff safety and health in violation of the Eighth Amendment of the United States Constitution, by jeopardizing the safety of my health subjecting me to unnecessary and wanton infliction on mental stress, emotional and psychological.

2. Parties

- ① My name Conzalos Glasco and I'm incarcerated at Pendleton Correction Facility, 4490 W. Reformatory Road, Pendleton, IN 46069
- ② Defendant Superintendent Hanks, is, or was a superintendent at P.C.F he is sued in his individual capacity for damages.
- ③ Defendant Major Elliott, is, or was a Major at P.C.F she is sued in her individual capacity for damages.
- ④ Defendant Captain Conyers, is, or was a captain at P.C.F he is sued in his individual capacity for damages.
- ⑤ Defendant Captain Stoneberger, is, or was a captain at P.C.F he is sued in his individual capacity for damages.
- ⑥ Defendant Captain Gilley, is, or was a captain at P.C.F he is sued in his individual capacity for damages.
- ⑦ Defendant Lieutenant Watson is, or was a Lieutenant at P.C.F he is sued in his individual capacity for damages.
- ⑧ Defendant (Sgt Kraus), is, or was a Sgt At P.C.F he is sued in his individual capacity for damages.

(1).

- (1) Defendant S. Mays, is, or was a correctional officer at P.C.F she is sued in her individual capacity for damages.
- (2) Defendant J. Moore, is, or was a correctional officer at P.C.F she is sued in her individual capacity for damages.
- (3) Defendant C. Bacote, is, or was a correctional officer at P.C.F he is sued in his individual capacity for damages.
- (4) Defendant grievance specialist Searle, is, or was a grievance specialist at P.C.F he is sued in his individual capacity for damages.
- (5) Defendant Doctor Laving, is or was a psychiatric at P.C.F he is sued in his individual capacity for damages.

Grievance Procedure

Plaintiff submitted numerous informal grievance about all his claims, pending Correction Facility cover up these violations, refuse to file plaintiff grievance see the attached informal evidence P.C.F custody destroy plaintiff grievances. Lewis v. Washington. 302, E. 3d 829, 7th Cir (2002).

Nature of Case

Defendants Motive, was to put the Plaintiff safety of his life and health in danger, Due to Plaintiff being listed as a (Sex offender) by telling other inmates Plaintiff is a (Child molester, Rapist) passing Plaintiff identification to other inmates. So these inmates could take Plaintiff identification and look and see what Plaintiff was arrested for and putting (Feces) in Plaintiff Food telling Plaintiff to eat that food with (Feces) in it, and scraping Plaintiff skin with handcuffs numerous of times (Intent). And these defendants having a hostile attitude toward Plaintiff at all times.

Cause of Action

I Allege that the following of constitution rights privilege immunities have been violated and that the following facts firm the basis of Allegations:

Claim ones: The defendants was inform of these matters and they disregarded these matters, by jeopardizing my safety and health, putting my safety and health in danger causing, severe mental stress.

If (The official knows of and disregards and excessive risk to inmates health and safety), Farmer V. Brennan, 511, U.S. 825, 833, 128, L. Ed. 2d 811, 114, S. Ct. 1970, (1994). THAT IN AN Eighth Amendment case, A prison official can be found reckless or deliberate indifference

Claim two: Defendant Serving Plaintiff food with (feces) in it
Nicholson v. Choctaw County - AIA: 498 F. Supp. 295, 313, S.D.

AIA: 1980), No Meat from an animal Killed on the highway or Road --- Shall be Serve in the Jail, Lightfoot v. Walker,

486, F. SUPP. 504, 512-13, 524 S.D. III. 1980)

Food is one of the basic necessities of life protected by the Eight Amendment.

Cause of Action with Supporting facts

At All times relevant to this complaint, the defendant, while acting under the color of State law, deprived Plaintiff, of his Eight Amendment Rights to the United States of America while a reasonable person would have known.

①

On November 3, 2012 at Pendleton Correction Facility - R-cellhouse Range - 3 - Cell - 1 Defendant S. Mays, started verbally abusing Plaintiff, calling Plaintiff a (Child Molester, Rapist) and other UNL justices, this began because Plaintiff confronted Defendants S. Mays, (Plaintiff is a Child Molester, Rapist) so other inmates could hear her because of this belief Defendant S. Mays, would verbally abuse Plaintiff with the handcuff scraping putting medical request slip for his skin being scraped from handcuffs, on 12-19-12 Defendant S. Mays, passing Plaintiff, identification to other inmates so these inmates could take Plaintiff identification and look to see what Plaintiff was arrested for, Several inmates have threatened to kill Plaintiff if they ever get a chance. Because of what Defendants S. Mays, have told these inmates about Plaintiff The verbally abuse continues by Defendant S. Mays, Defendants S. Mays, kept writing UNLAWFUL CONDUCT reports against Plaintiff to Retaliated against Plaintiff from Plaintiff Lawsuit.

② ON 11-27-12 Defendant C. Bacote, (A)

Started telling Plaintiff, to (Suck his Nutts.) This started because Plaintiff ASK Defendant C. Bacote, for (3) request pants and shirt for harassment purposes, Defendant C. Bacote, and Defendant J. Moore, told the other Defendants Plaintiff, will never see his sweat pants and shirt. The verbal Abuse continues by Defendant C. Bacote, (C) on 12-16-12 Defendant C. Bacote, began calling Plaintiff a punk, telling Plaintiff to shut up and Plaintiff can not read or write and telling the inmates Plaintiff eyes are crooked, Pendleton correction facility, high ranking Defendants keep giving Defendant C. Bacote, another opportunity to put (feces) in Plaintiff's food again, P.C.F. Continues right now having Defendant C. Bacote to bring Plaintiff food to him, Plaintiff, scared to eat his food After

- ② What Defendant C. Bacate did to plaintiff food, plaintiff requested over and over to have another officer to bring plaintiff food all request denied. Plaintiff continues to be in fear, scared to eat his food) (D) on 12-30-12 right after Nurse Waller gave Plaintiff his Medicine, Defendant J. Moore, excused plaintiff to Medical, while being escorted to Medical, Defendant C. Bacote Kept CALLING PLAINTIFF, Bitches, punks, AND telling Plaintiff to (Suck his Nutts) Review witness statement doing this verbally & base Plaintiff overheard Defendant C. Bacote, call Plaintiff/Child Nothings (A. Kraus witness statement)
- ③ Defendant J. Moore, would encourage Defendant C. Bacote, to harass Plaintiff, telling him to call Plaintiff, Bitches, punks, AND that Plaintiff, CAN NOT read or write. Also, encouraging Defendant C. Bacote, to put (Feces) in Plaintiff food. Defendant J. Moore, threatened AN IMMEDIATE STATEMENT to this (Immune). He better not get caught talking to Plaintiff. (Review witness statement)
- ④ On January 29, 2013 at P.C.F Defendant Watson, encouraged Defendant ~~was~~ Defendant Hoover, to Retaliate against Plaintiff, By using excessive force against Plaintiff holding Plaintiff down while Defendant Hoover, take suringe and shoot Medicine in Plaintiff butt area. This happen to Plaintiff, because Plaintiff has a law suit pending against P.C.F Staff Members. Instead of admitting the true, these three defendants lie stating Plaintiff is crazy and need Medicine, but Plaintiff never been on Mental Medicine.
- ⑤ Defendant Superintendent Hanks, encouraging these defendants to harass plaintiff by ignoring these serious matters, after having a conversation with Defendant Hanks on November 30, 2012 About these Defendants Verbally Abusing, continue harassing plaintiff and Nothing done About it, and Nothing was done about Defendant C. Bacote including Defendant J. Moore, putting (Feces) in plaintiff food. Defendant Superintendent Hanks, continue doing Nothing About the harassment Against plaintiff.
- ⑥ Defendant Major Elliott, encouraging these defendants to harass plaintiff after having a conversation with Defendant Elliott, About these defendants harassing plaintiff, Defendant Elliott is aware of this harassment by each and every Defendants, and Defendant Elliott Continues doing Nothing About this harassment.
- ⑦ Defendant Lead Captain Conyers, encouraging these Defendants to continue the harassment against the plaintiff, After having a conversation with defendant conyers, About defendant S. Mays, Defendant J. Moore, Defendant C. Bacote, harassing the plaintiff and giving the defendant a chance to put (Feces) in plaintiff food again Defendant conyers told plaintiff we will continue harassing plaintiff, and Nothing's going to be done About it.
- ⑧ Defendant Captain Gilley, encouraging these defendants by covering up this File Act, After having A conversation with Defendant Gilley, Requested through Defendant Gilley to examine Plaintiff food, check-out (through) Defendant Gilley told plaintiff they will not examine plaintiff food, (you eat it) or (don't eat it) Also telling plaintiff, Defendant S. Mays, Defendant J. Moore, Defendant C. Bacote, will continue harassing plaintiff anyway they can.

8.) Defendant captain Stonebarger, encouraging defendant C. Bacote to put feces in plaintiff food again I info
Case 1:13-cv-00303-RLY-MJD Document 1 Filed 02/22/13 Page 5 of 5 PageID #: 5
defendant Stonebarger, I fear, scared to eat my food cause defendant C. Bacote, continues bringing me my food, and
defendant C. Bacote, defendant T. Moore is responsible for (feces) in plaintiff food. Defendant Stonebarger, stated
these defendants will continue having an opportunity to put (feces) in plaintiff food.

9.) Defendant doctor Levine on 1-10-13 was questioning the plaintiff about defendants harassing plaintiff, plaintiff was
very specific explaining to defendant doctor Levine about these defendant harassing plaintiff, defendant doctor Levine,
ignore the facts about defendant harassing plaintiff defendant doctor Levine attempted to cover up this harassing
stating to plaintiff, plaintiff did not know what he's talking about and plaintiff was crazy defendant doctor
Levine threatened plaintiff, stating they will put plaintiff on medication and will use force to give plaintiff medicine,

10.) Defendant grievance specialist Scaife, on December 7, 2012 I had a conversation with defendant Scaife, I ask
defendant grievance specialist Scaife, when will I get a response from my grievance file against defendant S. Mays
on 11-5-12, 11-3-12 incident defendant grievance specialist Scaife stated defendant S. Mays did not do anything wrong,
and defendant grievance specialist Scaife walk away about the second week of January 2013, I had another ~~conversa~~
conversatation with defendant grievance specialist Scaife, I ask defendant grievance specialist Scaife, when will I receive
a response from informal grievance file against defendant C. Bacote, on 11-30-12, 11-27-12 incident and when will I receive
a response from informal grievance file against defendant T. Moore, on 12-5-12 incident and I still have not yet receive
a response from informal grievance file against defendant S. Mays 11-3-12 incident defendant grievance specialist
Scaife, stated, do not send him anymore grievance or nothing anymore.

11.) Circumstance described in paragraph (2) through (10) injured plaintiffs liberty and causing him extreme mental
emotional, and psychological injury.

Conclusion

I pray that the court will grant me the following relief,

- 12.) I seek compensatory damages in an amount to be determined by jury.
- 13.) Because defendant deliberated, violated my constitutional rights, I seek punitive damages in an amount to be determined by jury.
- 14.) I seek a declaratory judgement declaring that the defendants actions are unconstitutional.
- 15.) I seek all cost of bringing and maintaining this action.
- 16.) I ask the court for any other relief it deems just, proper and equitable that promisses.

Verification

I'm Conzalos Glasco I affirm under penalty of perjury
that the foregoing representation are within my personal
knowledge and are true.

Respectfully Submitted
CONZALOS GLASCO
Wingate Annex 890-756#
Pendleton Correctional Facility
4490 W. Retrometry Rd.
Pendleton, IN 46064